

# **Exhibit B**

**Perkins, Fred**

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**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Friday, June 27, 2025 4:59 PM  
**To:** Perkins, Fred  
**Cc:** Wing K. Chiu (wkc@lawmlg.com)  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

Ross Malaga will be updating the paths of the source code. It seems like we may have given a different version than the one that it was based on. I am confirming that and will then provide the other version of the code as well.



THE LAW OFFICE OF  
**AVRAM E. FRISCH LLC**

Avram E. Frisch, Esq.  
Frischa@avifrischlaw.com  
1 University Plaza, Suite 119 Hackensack, NJ 07601  
201-289-5352  
Fax: 866-883-9690

---

**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Friday, June 27, 2025 11:39 AM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

Can you please respond to my email below? Thanks.

Regards,

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP  
909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784  
212.735.8600 | morrisoncohen.com

**From:** Perkins, Fred  
**Sent:** Wednesday, June 25, 2025 6:27 PM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

Can you clarify what you mean about the "waiting for the client to answer about your source code question." In item no 2 below, I raised 3 separate questions regarding source code: (i) confirmation of dates of the source code you produced, (ii) whether Dumbo has any earlier version of source code to produce, and (iii) corrected information about the 46 files/directories that were misidentified in Dumbo's First Amended Responses to Defendants' second set of interrogatories. Is Dumbo going to provide answers to all three questions and if so when? Similarly, you have been saying the operational software will be ready to be exchanged soon, can you provide a date certain for such exchange?

Best regards,

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP  
909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784  
212.735.8600 | morrisoncohen.com

**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Wednesday, June 25, 2025 6:14 PM  
**To:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

The operational software should be ready soon.

I am still waiting for the client to answer about your source code question. I inquired about the documents and still waiting for them to be fully paid which apparently hasn't happened yet.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

---

**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Wednesday, June 25, 2025 5:40:06 PM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

While I understand you were in a deposition yesterday and you indicated that would get back to me today, I have not heard anything from you regarding issues Nos. 2, 3 and 4 in my June 24<sup>th</sup> email below. If you have information regarding these issues, please provide it asap. If it would be productive to discuss any or all of these items, I am available tomorrow between 3 to 5 pm.

Regards,

Fred

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

---

**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Tuesday, June 24, 2025 12:13 PM  
**To:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

---

In a deposition today. I did receive the flash drive, which was left with no signature with my 11 year old daughter. I will respond to the rest tomorrow.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

---

**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Tuesday, June 24, 2025 12:07:44 PM  
**To:** Avram Frisch <frischa@avifrischlaw.com>

Cc: Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

Subject: RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

I have not heard back from you regarding any of the various outstanding discovery matters as follows:

1. You did not confirm that you received the additional encrypted flash drives of Defs' source code we sent last week, but I understand from Fed Ex they were delivered to your home as per your request. Please confirm that you did receive these drives so I can provide you with the password to access them.
2. I have received no response to my June 18, 2025 (11:03 am email) regarding confirmation of dates of source code you produced, that Dumbo has no earlier version of source code to produce, and the 46 files/directories that were misidentified in Dumbo's First Amended Responses to Defendants' second set of interrogatories. I have attached another copy of that email and the document listing the misidentified files/directories. Please provide written response today.
3. When, if at all, will Dumbo be ready to produce documents responsive to Defendants' prior document requests which were due to be exchanged on May 30, 2025? You previously advised that production was delayed because Dumbo had not paid its e-discovery vendor, which vendor would not release the documents for production until such outstanding invoices to Dumbo were satisfied. You then advised that Dumbo had satisfied such invoices, but you have still not provided any date by which Dumbo would be ready to exchange such documents. In a further effort to meet and confer, I asked you by email last Wednesday, June 18<sup>th</sup> to provide by no later than June 23<sup>rd</sup> a firm date for when Dumbo is ready to produce its documents. I heard nothing from you in response. If Defendants do not receive today a firm date for such document production, we will have no choice but to raise this issue with the Court.
4. Similarly, you have failed to provide a firm date by which Dumbo would be prepared to exchange access to operational software populated with test data although such exchange was scheduled for May 30<sup>th</sup>. If Defendants do not receive today a firm date for such operational software exchange, we will have no choice but to raise this issue with the Court.

I look forward to hearing from you regarding all of the above matters today and am available to meet and confer by phone/zoom as needed.

Regards,

Fred

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

From: Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

Sent: Wednesday, June 18, 2025 1:19 PM



**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

Thanks. Will make sure someone is home tomorrow but if they come while I am in zoom court from 9-10 they will have to come back. At my office they were very good at showing up when I was away from my desk for a few minutes.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 18, 2025 12:38:43 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

Fed ex with the encrypted drives should be arriving at your home tomorrow at the address you provided. I'll provide the tracking number when I have it.

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue, 27th Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 18, 2025 12:06:26 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

We provided what we believed was all the code and when it was discovered there was additional code we are providing that. Please get back to me with FIRM dates by no later than Monday June 23 when you are prepared to EXCHANGE operational software and document productions as per the courts scheduling order.

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP  
909 Third Avenue, 27th Floor, New York, NY 10022-4784  
212.735.8600 | morrisoncohen.com

---

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Wednesday, June 18, 2025 12:01:09 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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Yet you have not done so. You also only sent a portion of your code and it was when it was reviewed that we determined that. I am looking into the other matters, but do not have an answer yet.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.  
[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)  
1 University Plaza, Suite 119 Hackensack, NJ 07601  
[201-289-5352](tel:201-289-5352)  
Fax: [866-883-9690](tel:866-883-9690)

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 18, 2025 11:59 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

Yes. Those were to be exchanged and we have been ready willing and able to do so for weeks.

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647  
[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP  
909 Third Avenue, 27th Floor, New York, NY 10022-4784  
212.735.8600 | morrisoncohen.com

---

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Wednesday, June 18, 2025 11:52:56 AM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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---

Notably, I do not have your complete source code or operational software or documents from you.

Avi



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.  
[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)  
1 University Plaza, Suite 119 Hackensack, NJ 07601  
[201-289-5352](tel:201-289-5352)  
Fax: [866-883-9690](tel:866-883-9690)

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 18, 2025 11:12 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

I will arrange to send three encrypted flash drives to your home address below. I will email you when I know when they are scheduled for delivery. As I explained, it would be completely inconsistent with the restrictive terms of our protective order to deliver flash drives containing highly confidential source code to any address where an authorized person could not sign for it and instead it would be somewhere where anyone might take it.

As of this Friday, it will be three weeks past the scheduled exchange date for operational software and document productions. If we cannot arrange for such exchange by early next week, then we will have no choice but to raise this issue with the Court. We hope that would not be necessary.

Regards,

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Wednesday, June 18, 2025 11:01 AM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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I don't have answers on the other issues just yet. I can tell you to send it to my home address at 1340 Mercedes St, Teaneck NJ 07666. My wife works from home so she is usually there but give me a heads up when it is coming so I can make sure. I really don't think in person signature is necessary.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 18, 2025 10:55:39 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

We do have additional source code to produce. As per our protective order, we will have the source code saved on encrypted flash drives. Where would you like them sent? As per our prior discussions, this is highly sensitive confidential material and we are not going to send source code Fed Ex no signature required. Therefore, can you advise me when you would be available in your office (all day) to accept a fed ex or whether there is an alternative address you wish to send where someone would be available to receive it? alternatively, if you prefer, we can arrange for it to be picked up by your authorized agent at my offices. Please advise how you wish to proceed. I will be traveling for the rest of this week, so if you can get back to me asap, that would be ideal.

Like the prior code we produced, all of this additional code is from July 29, 2022, except the mobile app source code is from August 8, 2022.

Also, I am still awaiting your response to my email of last Thursday regarding when you will be ready to exchange operational software and our respective document productions? You advised that your client has not paid the e-discovery vendor so that should no longer be an impediment and that you would be ready soon to exchange access to software with test data. Please advise.

Regards,

Fred

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

**From:** Perkins, Fred

**Sent:** Thursday, June 12, 2025 9:25 AM

**To:** Avram Frisch <frischa@avifrischlaw.com>

**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>

**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

I presumed that when you said you were told that.

Can you advise about timing for operational software exchange and document production?

Regards,

Fred

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

**From:** Avram Frisch <frischa@avifrischlaw.com>

**Sent:** Thursday, June 12, 2025 9:19 AM

**To:** Perkins, Fred <fhperkins@morrisoncohen.com>

**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>

**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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---

That is what Dr. Malaga told me.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

201-289-5352

Fax: 866-883-9690

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Thursday, June 12, 2025 9:17 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

That is not my understanding, but I'll look into your concern and get back to you. When will you be ready to exchange access to operational software soon and documents?

Regards,

Fred

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Thursday, June 12, 2025 8:59 AM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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Fred,

I am told that the code you sent is incomplete and only includes the API and not the CRM, Foreman, and user UI components. Please provide that ASAP.

Avi



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frisha@avifrischlaw.com](mailto:Frisha@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

[201-289-5352](tel:201-289-5352)

Fax: [866-883-9690](tel:866-883-9690)

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Monday, June 9, 2025 11:14 AM  
**To:** Avram Frisch <[frisha@avifrischlaw.com](mailto:frisha@avifrischlaw.com)>  
**Cc:** Wing K. Chiu (<[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Ok. Thanks for the update. We will need at least 2 business days' advance notice to be ready to exchange documents. Please advise when you have the documents in hand and when you will be ready to do the exchange.

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

---

**From:** Avram Frisch <[frisha@avifrischlaw.com](mailto:frisha@avifrischlaw.com)>  
**Sent:** Monday, June 9, 2025 11:04 AM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>



**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

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I am told the fees were paid to the document storage company so hopefully will get it this week.

Avi



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

201-289-5352

Fax: 866-883-9690

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>

**Sent:** Friday, June 6, 2025 10:29 AM

**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

What is your best ETA on the documents being obtained?

**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

**Sent:** Friday, June 6, 2025 10:28 AM

**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>

**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

CAUTION: External sender. Verify before continuing.

The documents haven't been obtained yet

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Friday, June 6, 2025 10:17:59 AM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (<wkc@lawmlg.com>) <wkc@lawmlg.com>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

As previously indicated, the source code that we produced was on behalf of all Defendants. It was provided by Mr. Plokhikh. None of the other defendants possess any copy of the source code.

Do you think you will be in a position to exchange access to the respective operational software next week?

As requested several times in recent emails, please also update us on the status of your client's access to its pending documents to produce. Has all financial impediments to such production been addressed by your client? In order to exchange these productions, we need a timeline as to when you expect to be ready to produce.

Thanks.

Regards,

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Friday, June 6, 2025 9:25 AM  
**To:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Cc:** Wing K. Chiu (<wkc@lawmlg.com>) <wkc@lawmlg.com>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

CAUTION: External sender. Verify before continuing.

Still working on the operational software. They are actively creating a test environment from what I understand. Wing, please confirm that your client does not possess an independent version of the source code for my client's software.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

[201-289-5352](tel:201-289-5352)

Fax: [866-883-9690](tel:866-883-9690)

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Thursday, June 5, 2025 11:13 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu (<[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Understood. Please provide an update today regarding the software exchange and document production as previously requested. Thanks.



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Thursday, June 5, 2025 11:05 AM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu (<[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

I don't believe that it is

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

---

**From:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Sent:** Thursday, June 5, 2025 11:02:48 AM  
**To:** Avram Frisch <frischa@avifrischlaw.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

Having outlook issues so sending from my phone. One question regarding your password is PW= part of the password?

Our password is mJ512@y09)51kf175HGoPe!

As to signing for fed ex packages I explained why that was necessary regarding source code  
Please get back to me today about the software exchange and document production status



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

fhperkins@morrisoncohen.com

vCard | Bio | LinkedIn

Morrison Cohen LLP

909 Third Avenue, 27th Floor, New York, NY 10022-4784

212.735.8600 | morrisoncohen.com

---

**From:** Avram Frisch <frischa@avifrischlaw.com>  
**Sent:** Thursday, June 5, 2025 10:52:56 AM  
**To:** Perkins, Fred <fhperkins@morrisoncohen.com>  
**Cc:** Wing K. Chiu (wkc@lawmlg.com) <wkc@lawmlg.com>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

**CAUTION:** External sender. Verify before continuing.

---

Still waiting on you to send the passcode to your source code. I sent mine.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

201-289-5352

Fax: 866-883-9690



---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 4, 2025 12:51 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Given the highly confidential and restricted nature of the limited access to the source code under the Court's protective order, it would not be prudent to waive signature. I'm glad to hear that you will be there tomorrow in advance of the expected delivery time which is sometime before 10:30 am. You can always contact Fed Ex to make sure it is delivered when you will be there.

While I understand you're in court this morning, please advise asap regarding the other issues I raised in my email below: (i) exchanging password access today; (ii) when operational software can be exchanged; and (iii) status of your access and timing for exchange of documents.



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)

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909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

---

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Wednesday, June 4, 2025 12:43 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC - May 30th scheduled discovery exchange

CAUTION: External sender. Verify before continuing.

---

Fred, I am in court this morning. You should have waived signature. I cannot speak to what happened to my note. I will be there tomorrow morning.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Wednesday, June 4, 2025 12:36:14 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC - May 30th scheduled discovery exchange

Avi,

As per our prior emails below, FedEx has again attempted delivery of the encrypted flash drives to your office, the address you designated to receive the drives, and once again, no one was there to accept the package. See below FedEx screenshot. While you indicated last Friday you would leave a note on the door authorizing FedEx to leave the package in the care of your building super, who would sign for it and deliver it to you, apparently – based on the picture below when FedEx tried to deliver the package this morning – there was no such instruction left on the door. As per FedEx screen shots from tracking the package, the package is currently available to be picked up TODAY at the Fed Ex facility located at 100 Redneck Ave. I urge you once again to pick up the package from FedEx to avoid further delays.

If you are for some reason unable to pick up the package today directly from FedEx's facilities, FedEx indicates that they will make a FINAL delivery attempt on Thursday morning PRIOR to 10:30 AM. Given the court's scheduling order to EXCHANGE the flash drives on May 30<sup>th</sup>, your inability thus far to receive this important package containing encrypted source code is impeding Defendants' ability to move forward with its defense of the case. Therefore, I again request (as I did last Friday) that you provide me asap with the encrypted passwords for the flash drives I received last Friday so my experts can start their review. It is unfair that we are being delayed in so doing due to delivery issues that should not exist with a professional law office. If you were aware that no one could accept the package in your absence, then you should have effectively arranged for someone else to accept the package in your absence or have it delivered to an address where there is always someone authorized to accept the package on your behalf. As I previously explained, if you do not pick up the package or actually have someone present when FedEx tries to redeliver the package tomorrow morning, it may take a week or more in my experience for Fed Ex to return the package to my office, which would be further unacceptable delay. If that happens, I will insist that you either supply an address that will unquestionably have an authorized agent to sign for it or you can arrange for it to be picked up by you or your messenger at my offices. Again, the prejudicial impact of this delay on Defendants can be alleviated by simply giving us the password today to access the drives we received.

In addition, are you now ready to exchange access to Dumbo's and Defendants' respective operational software with test data as previously discussed and required to be done on May 30<sup>th</sup>? We remain ready, willing and able to do so.

Lastly, do you have any update on when you will be ready to exchange documents responsive to prior requests? Has your client now fully paid your e-discovery vendor's outstanding invoices so that is no longer an impediment to the document exchange required to be done on May 30<sup>th</sup>?

I look forward to hearing from you asap so all of these discovery exchange issues can be definitively addressed and resolved.

Regards,

Fred

FedEx® Tracking

[Track Another Shipment](#)[Local Scan Time](#) ▾[Help](#)

SHOPRUNNER by FedEx

**Ready to shop again?**

Get exclusive deals at your favorite stores.

[SHOP NOW](#)**DELIVERY DATE**

You can pick up your package after at 100 REDNECK AVENUE FedEx Facility or we'll make a final attempt the next business day.

**DELIVERY STATUS**

We tried to deliver →

**ADD YOUR EMAIL TO STAY UPDATED ON THIS SHIPMENT**

[GET UPDATES](#)**MORE OPTIONS****TRACKING ID**

881625941700 ✎ ☆ 📄

**FROM**

MorrisonCohen LLP  
 Fred H. Perkins  
 909 Third Avenue  
 New York, NY US 10022  
 2127358655

**Label Created**

5/29/25 11:06 AM

**WE HAVE YOUR PACKAGE****WE TRIED TO DELIVER**

MOONACHIE, NJ  
 6/4/25 9:38 AM

**OUT FOR DELIVERY**

MOONACHIE, NJ  
 6/11/25 8:49 AM

[Manage delivery](#) ▾

We've updated the estimated delivery of your shipment.

**Scheduled delivery date**

Thu, 06/05/2025  
Before 10:30am

Take more control of your shipments

Save delivery instructions, get  
picture proof of delivery, and  
more.

**GET FEDEX DELIVERY MANAGER**

Some delivery options might not be  
available on the day of delivery.





**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Perkins, Fred

**Sent:** Friday, May 30, 2025 4:07 PM

**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

**Subject:** RE: Dumbo v. POC

Avi,

Please reply to email below before the end of your day. Thanks.

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

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Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Perkins, Fred

**Sent:** Friday, May 30, 2025 2:58 PM

**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>

**Subject:** RE: Dumbo v. POC

My assistant arranged for Fed Ex to redeliver on Wednesday. Please make sure some adult will be able to sign for and hold it for you securely if you will not be there.

In the meantime, are the drives you sent encrypted? If so, I would like my experts to start their review and not be delayed while FedEx redelivers what was deliverable today. So, if encrypted, can you please share the passwords?



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

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Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

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**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, May 30, 2025 2:47 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC

CAUTION: External sender. Verify before continuing.

I left a note on the door to leave it with the super. I think I am in court on Wednesday.

Avi Frisch  
The Law Office of Avram E. Frisch LLC  
201-289-5352

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Friday, May 30, 2025 2:34:20 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC

My assistant is contacting Fed Ex to see if they can redeliver to you this afternoon or Wednesday morning. It could take a week or more in my experience before the package comes back to me. I'll keep you advised.



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647  
[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

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909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784  
212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, May 30, 2025 2:29 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC

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When it gets returned to you, then you can send it again I guess. They showed up in the five minutes I took a little walk this morning.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

201-289-5352

Fax: 866-883-9690

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Friday, May 30, 2025 2:10 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)> <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** RE: Dumbo v. POC

Tracking info is below. Because of the sensitive nature, an actual signature is required to accept the package as I don't want the package to be left where someone else might get it. I presume they will seek to redeliver on Monday. Obviously, feel free to contact FedEx to make sure you will be there when they redeliver.



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

212.735.8600 | [morrisoncohen.com](http://morrisoncohen.com)

**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, May 30, 2025 2:01 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Wing K. Chiu <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)> <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** Re: Dumbo v. POC

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I do not see any slip on my door. Do you have a tracking number? I am not picking it up, so ask them to waive signature.



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

Avram E. Frisch, Esq.

[Frischa@avifrischlaw.com](mailto:Frischa@avifrischlaw.com)

1 University Plaza, Suite 119 Hackensack, NJ 07601

201-289-5352

Fax: 866-883-9690

---

**From:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Sent:** Friday, May 30, 2025 1:20 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Wing K. Chiu ([wkc@lawmlg.com](mailto:wkc@lawmlg.com)) <[wkc@lawmlg.com](mailto:wkc@lawmlg.com)>  
**Subject:** FW: Dumbo v. POC

Avi,

While I received your Fed Ex package containing the three flash drives, according to Fed Ex, no one was available at your office to sign my package. See screenshots from my assistant below. As per FedEx, you can pick up the package or have it re-delivered. Please advise how you want to proceed and email me once you have the package so we can exchange passwords.

Regards,

Fred



**Fred H. Perkins**

Partner & Co-Chair, Technology, Data & IP

D 212.735.8647

[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)

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909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

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**From:** Espada, Maria <[mespada@morrisoncohen.com](mailto:mespada@morrisoncohen.com)>  
**Sent:** Friday, May 30, 2025 12:11 PM  
**To:** Perkins, Fred <[fhperkins@morrisoncohen.com](mailto:fhperkins@morrisoncohen.com)>  
**Cc:** Espada, Maria <[mespada@morrisoncohen.com](mailto:mespada@morrisoncohen.com)>  
**Subject:** RE: Dumbo v. POC

Fred,  
Below is the screen shot of our delivery attempt to Avi.





Shipping ▾

Tracking ▾

Design &amp; Print ▾

Locations ▾

Support ▾

Maria

**DELIVERY DATE**

You can pick up your package after at FedEx Facility 100 REDNECK AVENUE, or we'll try to deliver again during the next business day.

**DELIVERY STATUS**

We tried to deliver

**ADD YOUR EMAIL TO STAY UPDATED ON THIS SHIPMENT**

**GET UPDATES****MORE OPTIONS****TRACKING ID**

881625941700

**FROM**

MorrisonCohen LLP  
Fred H. Perkins  
909 Third Avenue  
New York, NY US 10022  
2127358655

*Label Created*

5/29/25 11:06 AM

**WE HAVE YOUR PACKAGE****WE TRIED TO DELIVER**

MOONACHIE, NJ  
5/30/25 10:00 AM

**OUT FOR DELIVERY**

MOONACHIE, NJ  
5/30/25 8:38 AM

**TO**

Avram E. Frisch  
1 University Plaza Drive, #119  
HACKENSACK, NJ US 07601  
2127358655

*Scheduled Delivery Date*

6/2/25 before 10:30 AM

Manage delivery ▾



## Package details

<b>WEIGHT</b>	0.5 lbs / 0.23 kgs
<b>TOTAL PIECES</b>	1
<b>TOTAL SHIPMENT WEIGHT</b>	0.5 lbs / 0.23 kgs
<b>PACKAGING</b>	FedEx Envelope

[↑ Back to top](#)

## Travel history

SORT BY DATE/TIME

Time zone

Ascending

Local Scan Time

Thursday, 5/29/25

9:13 AM	•	Shipment information sent to FedEx	
6:15 PM	•	Shipment arriving On-Time	MOONACHIE, NJ
6:15 PM	•	Picked up	MOONACHIE, NJ
10:10 PM	•	Left FedEx origin facility	MOONACHIE, NJ
10:39 PM	•	Arrived at FedEx hub	NEWARK, NJ

Friday, 5/30/25

7:01 AM	•	At local FedEx facility	NEW YORK, NY
8:23 AM	•	On FedEx vehicle for delivery	NEW YORK, NY
9:50 AM	•	Delivery exception Customer not available or business closed	NEW YORK, NY
9:52 AM	•	Delivery updated Delivery updated	NEW YORK, NY
11:56 AM	✓	Delivered	New York, NY

[↑ Back to top](#)**Maria Espada**

Administrative Assistant

D 212.735.8875

mespada@morrisoncohen.com

Morrison Cohen LLP

909 Third Avenue, 27<sup>th</sup> Floor, New York, NY 10022-4784

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